

**VIA ECF**

The Hon. Stewart D. Aaron  
 United States District Court for the Southern District of New York  
 500 Pearl St.  
 New York, NY 10007

October 16, 2020

Request GRANTED on consent.  
 SO ORDERED.  
 Dated: 10/17/2020

**Re: Allianz, et al. v. Bank of America Corp. et al., 18-cv-10364-LGS**

A handwritten signature in blue ink, appearing to read "Att C an".

Dear Judge Aaron:

On behalf of all parties in the above-referenced action, we write to request a brief extension of the deadline to submit the parties' disputes on search terms. This would move the deadline four business days from October 16, 2020 to October 22, 2020. Since the Court ordered the October 16 deadline (Dkt. 542), the parties' conferrals on search terms have been productive, and we have significantly narrowed the disputes. However, there are a handful of issues that require further global and bilateral conferrals, and having additional time would benefit the parties and the Court. This extension would not affect any other currently-scheduled deadline.

Additionally, pursuant to the Court's order dated October 2, 2020 (Dkt. 542), we write to update the Court on the status of custodial negotiations. The parties have made significant progress with regard to custodial negotiations over the past few weeks. Specifically, Plaintiffs can report that the parties have reached custodian agreements with five Defendants: BNP Paribas, MUFG, Royal Bank of Scotland, Société Générale and Standard Chartered. This agreement thus moots the pending motion to compel filed by Plaintiffs against RBS. We also continue to conduct bilateral negotiations with several defendants, including Credit Suisse, Goldman Sachs and Royal Bank of Canada. The delta on these negotiations is small, and there is a respectable chance the parties could reach agreement by the end of next week. As to the remaining Defendants, the Court has already ruled on Plaintiffs' motion to compel as to Citi, and there are currently pending motions to compel or motions for protective order that will need to be decided as to Bank of America, Barclays, Deutsche Bank, HSBC, JPMorgan, Morgan Stanley, and UBS.

Respectfully submitted,

QUINN EMANUEL URQUHART & SULLIVAN, LLP

By: /s/ Daniel L. Brockett  
 Daniel L. Brockett  
 51 Madison Avenue, 22nd Floor  
 New York, New York 10010  
 Telephone: (212) 849-7000  
 Fax: (212) 849-7100  
 danbrockett@quinnemanuel.com

Anthony P. Alden (pro hac vice)  
 Jeremy D. Andersen (pro hac vice)  
 Johanna Y. Ong (pro hac vice)  
 865 South Figueroa Street, 10th Floor

Los Angeles, California 90017  
Telephone: (213) 443-3000  
Fax: (213) 443-3100  
anthonyalden@quinnemanuel.com  
jeremyandersen@quinnemanuel.com  
johannaong@quinnemanuel.com

*Counsel for Plaintiffs*

**SHEARMAN & STERLING LLP**

By: /s/ Adam S. Hakki  
Adam S. Hakki  
Richard F. Schwed  
Jeffrey J. Resetarits  
599 Lexington Avenue  
New York, New York 10022  
Telephone: (212) 848-4000  
ahakki@shearman.com  
rschwed@shearman.com  
jeffrey.resetarits@shearman.com

*Attorneys for Defendants Bank of America  
Corporation, Bank of America, N.A. and Merrill  
Lynch, Pierce, Fenner & Smith Incorporated*

**ALLEN & OVERY LLP**

By: /s/ David C. Esseks  
David C. Esseks  
Laura R. Hall  
Rebecca Delfiner  
1221 Avenue of the Americas  
New York, New York 10020  
Telephone: (212) 610-6300  
david.esseks@allenoverly.com  
laura.hall@allenoverly.com  
rebecca.delfiner@allenoverly.com

**PATTERSON, BELKNAP, WEBB & TYLER  
LLP**

By: /s/ Joshua A. Goldberg  
Joshua A. Goldberg  
Alejandro H. Cruz  
Camille L. Fletcher  
Patterson, Belknapp, Webb & Tyler LLP  
1133 Avenue of the Americas  
New York, NY 10036  
Telephone: (212) 336-2000  
acruz@pbwt.com  
cfletcher@pbwt.com  
jgoldberg@pbwt.com

*Attorneys for Defendants BNP Paribas Group,  
BNP Paribas USA, Inc., BNP Paribas S.A. and  
BNP Paribas Securities Corp.<sup>1</sup>*

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<sup>1</sup> Allen & Overy LLP does not represent Defendants BNP Paribas Group, BNP Paribas USA, Inc., BNP Paribas S.A. and BNP Paribas Securities Corp. with respect to claims by Claimants affiliated with BlackRock, Inc.

SULLIVAN & CROMWELL LLP

By: /s/ Matthew A. Schwartz  
Matthew A. Schwartz  
Jacob B. Lieberman  
Matthew A. Peller  
125 Broad Street  
New York, New York 10004  
Telephone: (212) 558-4000  
schwartzmatthew@sullcrom.com  
pellerma@sullcrom.com  
liebermanj@sullcrom.com  
agham@sullcrom.com

*Attorneys for Defendants Barclays Bank plc,  
Barclays plc and Barclays Capital Inc.*

CAHILL GORDON & REINDEL LLP

By: /s/ David G. Januszewski  
David G. Januszewski  
Herbert S. Washer  
Elai E. Katz  
Jason M. Hall  
Sheila C. Ramesh  
Miles Wiley  
80 Pine Street  
New York, New York 10005  
Telephone: (212) 701-3000  
djanuszewski@cahill.com  
hwasher@cahill.com  
ekatz@cahill.com  
jhall@cahill.com  
sramesh@cahill.com  
mwiley@cahill.com

*Attorneys for Defendants Credit Suisse AG and  
Credit Suisse Securities (USA) LLC*

COVINGTON & BURLING LLP

By: /s/ Andrew A. Ruffino  
Andrew A. Ruffino  
620 Eighth Avenue  
New York, NY 10018-1405  
Telephone: (212) 841-1000  
aruffino@cov.com

Andrew D. Lazerow (pro hac vice motion  
forthcoming)  
850 10th Street NW  
Washington, DC 20001  
Telephone: (202) 662-5081  
alazerow@cov.com

*Attorneys for Defendants Citigroup, Inc.,  
Citibank, N.A., Citigroup Global Markets, Inc.*

LATHAM & WATKINS LLP

By: /s/ Joseph Serino, Jr.  
Joseph Serino, Jr.  
885 Third Avenue  
New York, New York 10022  
Telephone: (212) 906-1717  
joseph.serino@lw.com

KING & SPALDING LLP

By: /s/ G. Patrick Montgomery  
G. Patrick Montgomery (admitted pro hac vice)  
1700 Pennsylvania Ave., NW  
Washington, DC 20006  
Telephone: (202) 626-5444  
pmontgomery@kslaw.com

*Attorneys for Defendants Deutsche Bank AG and  
Deutsche Bank Securities Inc.*

CLEARY GOTTlieb STEEN &  
HAMILTON LLP

By: /s/ Thomas J. Moloney  
Thomas J. Moloney  
Rishi N. Zutshi  
One Liberty Plaza  
New York, New York 10006  
Telephone: (212) 225-2000  
tmoloney@cgsh.com  
rzutshi@cgsh.com

*Attorneys for Defendants The Goldman  
Sachs Group, Inc. and Goldman Sachs &  
Co. LLC*

LOCKE LORD LLP

By: /s/ Gregory T. Casamento  
Gregory T. Casamento  
3 World Financial Center  
New York, New York 10281  
Telephone: (212) 812-8325  
gcasamento@lockelord.com

Roger B. Cowie  
2200 Ross Avenue, Suite 2200  
Dallas, TX 75201  
Telephone: (214) 740-8000  
rcowie@lockelord.com

J. Matthew Goodin  
Julia C. Webb  
111 South Wacker Drive  
Chicago, IL 60606  
Telephone: (312) 443-0700  
jmgoodin@lockelord.com  
jwebb@lockelord.com

*Attorneys for Defendants HSBC Bank plc, HSBC  
North America Holdings, Inc., HSBC Bank USA,  
N.A., and HSBC Securities (USA) Inc.*

DONTZIN NAGY & FLEISSIG LLP

By: /s/ Tibor L. Nagy, Jr.

Tibor L. Nagy, Jr.

Jason A. Kolbe

Anuja Thatte

Dontzin Nagy & Fleissig LLP

980 Madison Avenue

New York, NY 10075

Telephone: (212) 717-2900

tibor@dnflp.com

jkolbe@dnflp.com

athatte@dnflp.com

SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM LLP

By: /s/ Boris Bershteyn

Boris Bershteyn

Peter S. Julian

Tansy Woan

One Manhattan West

New York, New York 10001

Telephone: (212) 735-3000

boris.bershteyn@skadden.com

peter.julian@skadden.com

tansy.woan@skadden.com

Gretchen Wolf (admitted *pro hac vice*)

155 N. Wacker Dr., Suite 2700

Chicago, Illinois 60606

Telephone: (312) 407-0956

gretchen.wolf@skadden.com

Paul M. Kerlin (admitted *pro hac vice*)

1440 New York Avenue N.W.

Washington, DC 20005

Telephone: (202) 371-7000

paul.kerlin@skadden.com

*Attorneys for Defendants JPMorgan Chase &  
Co., JPMorgan Chase Bank, N.A. and J.P.  
Morgan Securities LLC<sup>2</sup>*

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<sup>2</sup> Skadden, Arps, Slate, Meagher & Flom LLP does not represent JPMorgan Chase & Co., JPMorgan Chase Bank, N.A. and J.P. Morgan Securities LLC with respect to claims by BlackRock, Inc. or BlackRock-related entities listed in Appendix C of the complaint.

WACHTELL, LIPTON, ROSEN & KATZ

By: /s/ Jonathan Moses

Jonathan Moses

51 West 52nd Street

New York, New York 10019

Telephone: (212) 403-1000

JMMoses@wlrk.com

*Attorneys for Defendants Morgan Stanley,  
Morgan Stanley & Co., LLC, and Morgan  
Stanley & Co. International plc*

MOORE AND VAN ALLEN PLLC

By: /s/ James P. McLoughlin, Jr.

James P. McLoughlin, Jr.

Mark A. Nebrig

Joshua D. Lanning

Moore & Van Allen PLLC

100 N. Tryon Street, Suite 4700

Charlotte, North Carolina 28202

Telephone: (704) 331-1000

jimmcloughlin@mvalaw.com

marknebrig@mvalaw.com

joshlanning@mvalaw.com

*Attorneys for The Royal Bank of Canada and  
Defendant RBC Capital Markets LLC on behalf  
of RBC Capital Markets LLC*

DAVIS POLK & WARDWELL LLP

By: /s/ Paul S. Mishkin  
Paul S. Mishkin  
Adam G. Mehes  
John M. Briggs  
450 Lexington Avenue  
New York, New York 10017  
Telephone: (212) 450-4000  
paul.mishkin@davispolk.com  
adam.mehes@davispolk.com  
john.briggs@davispolk.com

*Attorneys for Defendants The Royal Bank of  
Scotland plc and NatWest Markets Securities  
Inc.*

LINKLATERS LLP

By: /s/ James R. Warnot, Jr.  
James R. Warnot, Jr.  
Patrick C. Ashby  
Nicole E. Jerry  
1345 Avenue of the Americas  
New York, New York 10105  
Telephone: (212) 903-9000  
james.warnot@linklaters.com  
patrick.ashby@linklaters.com  
nicole.jerry@linklaters.com

Adam S. Lurie  
601 13th St. NW  
Suite 400  
Washington, DC 20005  
Telephone: (202) 654-9227  
adam.lurie@linklaters.com

MAYER BROWN LLP

By: /s/ Steven Wolowitz  
Steven Wolowitz  
Henninger S. Bullock  
Andrew J. Calica  
Victoria D. Whitney  
1221 Avenue of the Americas  
New York, New York 10020-1001  
Telephone: (212) 506-2500  
swolowitz@mayerbrown.com  
hbullock@mayerbrown.com  
acalica@mayerbrown.com  
vwhitney@mayerbrown.com

*Attorneys for Defendants Société Générale S.A.  
and SG Americas Securities, LLC<sup>3</sup>*

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<sup>3</sup> Linklaters LLP does not represent Société Générale or SG Americas Securities, LLC with respect to claims by BlackRock, Inc. or the BlackRock-related entities listed in Appendix C of the Complaint.

HOGAN LOVELLS US LLP

By: /s/ Marc J. Gottridge

Marc J. Gottridge

Lisa J. Fried

Benjamin A. Fleming

Charles Barrera Moore

390 Madison Avenue

New York, New York 10017

marc.gottridge@hoganlovells.com

lisa.fried@hoganlovells.com

benjamin.fleming@hoganlovells.com

charles.moore@hoganlovells.com

Telephone: (212) 918-3000

EVERSHEDS SUTHERLAND LLP

By: /s/ Lewis S. Wiener

Lewis S. Wiener

Ronald W. Zdrojeski

Meghana D. Shah

1114 Avenue of the Americas, 40th Floor

New York, New York 10036

Telephone: (212) 389-5000

lewiswiener@eversheds-sutherland.com

ronzdrojeski@eversheds-sutherland.com

meghanashah@eversheds-sutherland.com

*Attorneys for Defendant Standard Chartered  
Bank<sup>4</sup>*

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Eric J. Stock

Eric J. Stock

Philip O. Shapiro

200 Park Avenue

New York, New York 10166

Telephone: (212) 351-4000

estock@gibsondunn.com

pshapiro@gibsondunn.com

D. Jarrett Arp (admitted pro hac vice)

Melanie L. Katsur (admitted pro hac vice)

Amy Feagles (admitted pro hac vice)

1050 Connecticut Avenue, N.W.

Washington, DC 20036

Telephone: (202) 955-8500

jarp@gibsondunn.com

mkatsur@gibsondunn.com

afeagles@gibsondunn.com

*Attorneys for Defendants UBS AG and UBS  
Securities LLC*

cc: All counsel of record (via ECF).

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<sup>4</sup> Eversheds Sutherland (US) LLP only represents Standard Chartered Bank with respect to claims by AllianzGI GmbH, the Allianz Entities, PIMCO, and the PIMCO Funds, all as defined in the Complaint.